

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 284, 285, 298, 300, 499 & 500

**CERTIFICATION OF COUNSEL**

I, Kimberly A. Brown, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 21, 2022, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtor’s Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Tax Services Provider Nunc Pro Tunc to November 28, 2022* [D.I. 284] (the “Application”). In support of the Application, the Debtors filed under seal the *Declaration of Thomas M. Shea in Support of Debtors’ Application for Order Authorizing the Retention and Employment of Ernst & Young LLP as its Tax Services Provider, Nunc Pro Tunc to November 28, 2022* [D.I. 285].

2. On December 23, 2022, the Debtors filed under seal *Exhibit B to Declaration of Thomas M. Shea in Support of Debtors Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Tax Services Provider Nunc Pro Tunc to November 28, 2022* [D.I. 298], a redacted version of which was filed at docket number 300.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. On January 16, 2023, the Debtors filed the *Supplemental Declaration of Thomas M. Shea in Support of Debtors' Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Tax Services Provider Nunc Pro Tunc to November 28, 2022* [D.I. 499] (the "Supplemental Shea Declaration"). The Debtors also filed the *Notice of Filing Unredacted Version of Declaration of Thomas M. Shea in Support of Debtors' Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Tax Services Provider Nunc Pro Tunc to November 28, 2022* [D.I. 500] (the "Unsealed Shea Declaration").

4. As of the date hereof, no formal objection or other responses to the Application have been filed or served on the Debtors. The Debtors received informal comments (the "Informal Comments") to the proposed form of order filed with the Application from the United States Trustee (the "U.S. Trustee") and the Official Committee of Unsecured Creditors (the "Committee").

5. To resolve the Informal Comments, the Debtors have filed the Supplemental Shea Declaration, the Unsealed Shea Declaration and revised the proposed form of order (the "Revised Order"), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed order attached to the Application is attached hereto as **Exhibit B**. The U.S. Trustee and the Committee have no objection to the entry of the Revised Order. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

6. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: January 16, 2023  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Kimberly A. Brown

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*Proposed Counsel for the Debtors  
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